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August 20, 2018

## **VIA ECF**

Hon. Vernon S. Broderick United States District Court Southern District of New York Thurgood Marshall United States Courthouse 40 Foley Square, Room 415 New York, NY 10007

Re:

Great Western Ins. Co. v. Mark Graham et al.,

Case No. 1:18-cv-06249 (VSB)

Dear Judge Broderick:

We represent Defendant Sancus Capital Blue Credit Opportunities Fund, Ltd. ("<u>Sancus Blue</u>") in the above-captioned matter. At present, the deadline for Sancus Blue to answer, move, or otherwise respond to the Complaint is September 4, 2018.

We write to respectfully request an extension of this deadline to September 28, 2018. Such an extension will allow us further time to assess the Complaint with our client. Further, we understand that other Defendants have received a similar extension (*see* ECF Nos 16, 22), which will allow the parties to proceed on a coordinated schedule.

We have received Plaintiff's consent to this request. No prior request for such an extension has been made by Sancus Blue, and no scheduling order needs to be amended, per Rule 1(H) of Your Honor's Individual Rules.

Respectfully submitted,

Jáck Yoskowitz

cc: Counsel of Record (via ECF)